

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Northern District of New York

UNITED STATES OF AMERICA)

v.)

Deanna SIMON,)

Case No. 8:25-MJ-93 (GLF)

Defendant.)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.


On or about the date(s) of March 27, 2025, in the county of Clinton in the Northern District of New York the defendant violated:

Code Section
8 U.S.C. § 1324(a)(1)(A)(ii)

Offense Description
The Defendant, knowing and in reckless disregard of the fact that an alien has come to, entered, or remained in the United States in violation of law, did transport, move and attempt to transport and move, such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law.

This criminal complaint is based on these facts:


☒ Continued on the attached sheet.


Complainant's signature
U.S. Customs and Border Protection Agent, Jason Brault

Printed name and title

Attested to by the Affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: APRIL 1, 2025


Judge's signature

City and State: Plattsburgh, New York

Hon. Gary L. Favro, U.S. Magistrate Judge

Printed name and title

Continuation Sheet, United States v. Deanna SIMON.

This criminal complaint is based on the following facts:

On March 27, 2025, at approximately 12:30 p.m., the defendant, Deanna SIMON, was encountered at the Cannons Corner Port of Entry in Cannons Corner, New York, in the Northern District of New York. SIMON was attempting to enter the United States from Canada in a white Chevrolet Trailblazer. SIMON provided her Canadian passport as proof of identity and citizenship. During primary questioning by a United States Customs and Border Protection (CBP) Officer, SIMON, in English, claimed that she was planning on traveling to Plattsburgh, New York for a few hours, and would be returning to her home in Canada later that day. SIMON gave a negative customs declaration.

CBP Officers subsequently searched the vehicle. During the search of the vehicle, CBP Officers opened the trunk of the vehicle, and found numerous pieces of luggage, which were not consistent with a day trip to Plattsburgh. Upon further examination, CBP Officers noticed that the spare tire cover was not sitting flat along the floor of the trunk; they lifted the cover, and discovered a female concealed underneath. The concealed female was later identified as Shirlon SIMON, an alien and citizen of Saint Vincent with no lawful status in the United States. Shirlon SIMON admitted, in English, to hiding in the trunk of the vehicle to avoid immigration inspection because she did not possess a valid visa or any documents to permit her legal entry in the United States.

Both subjects were transported to the Champlain Border Patrol Station for further investigation and processing.

At the station, the subjects were evaluated by on-site medical personnel. Shirlon SIMON claimed to be seven (7) months pregnant, and said she had recent vaginal bleeding. Medical personnel recommended she be transported to the hospital for further evaluation. She was taken, by ambulance, in CBP custody, to Champlain Valley Physician's Hospital in Plattsburgh, New York. Upon her subsequent release from the hospital, she was transported back to the Champlain Port of Entry and processed for expedited removal.

Deanna SIMON was read her Miranda rights, and she agreed to answer questions without a lawyer present. In her interview, Deanna SIMON stated that that her sister asked her to rent a car to drive her across the United States/Canadian border to Plattsburgh, New York. Deanna SIMON stated that she knew her sister was not in possession of any lawful documents that would allow her to be in the United States legally, and that she knew her sister's visa had been previously cancelled. Deanna SIMON further admitted that she knew that her sister was hiding in the trunk of the vehicle to avoid inspection by United States Customs and Border Protection Officers, all in an attempt to further her unlawful entry into the United States.